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Attorneys for defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TAMARA WAREKA,	:	CIVIL ACTION
	:	NO. 2:21-cv-06227-SRC-CLW
	:	
	:	
Plaintiff,	:	Honorable Stanley R. Chesler, U. S. D. J.
	:	Honorable Cathy L. Waldor, U. S. M. J.
-vs.-	:	
	:	
DIMITRY RABKIN, M.. D., P.C. dba	:	NOTICE OF MOTION FOR
ESTHETICA MD and DOES 1 through 10	:	LEAVE TO FILE
inclusive,	:	THIRD-PARTY COMPLAINT
	:	
	:	
	:	Return Date: November 1, 2021
Defendant.	:	
	:	Oral Argument Requested
	:	

TO: Hany Gonzales, Esq.
Higbee & Associates
1504 Brookhollow Drive - Suite 112
Santa Ana, CA 92705
Attorney for Plaintiff

PLEASE TAKE NOTICE that on Monday, November 1, 2021 at 9:00 a.m. or as soon thereafter as counsel may be heard, Clifford J. Ramundo and Hartley T. Bernstein, counsel for defendant Dimitry Rabkin, M. D., shall move before the Honorable Cathy L. Waldor, U. S. M. J., at the Martin Luther King Building and United States Courthouse, 50 Walnut Street, Newark, New Jersey, for an Order granting defendant leave to file a Third-Party Complaint naming third party defendants LoveJuliet LLC, BuzzUp Digital, Bergenmama.com and Jennifer Law.

PLEASE TAKE FURTHER NOTICE that such defendant shall rely upon the attached Declaration of Dimitry Rabkin and Memorandum of Law in support of this Motion.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith in accordance with L. R. Civ. P. 7.1 (e).

Dated: September 30, 2021

/s/Clifford J. Ramundo
Clifford J. Ramundo
Attorney for Defendant

CERTIFICATION OF SERVICE

I, CLIFFORD J. RAMUNDO, an attorney at law of the State of New Jersey, admitted to practice before this Court, hereby certifies that on September 30, 2021, the within Notice of Motion, Declaration of Counsel and Proposed Order were electronically filed with the Clerk of the United States District Court for the District of New Jersey, and that a copy was served electronically via ECF, on the following:

Hany Gonzalez, Esq.
Higbee & Associates
1504 Brookhollow Drive - Suite 112
Santa Ana, CA 92705
Attorney for plaintiff

Dated: September 30, 2021

By: /s/ Clifford J. Ramundo
Clifford J. Ramundo
Attorney for defendant